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Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF
DEFENDANTS' MOTION IN LIMINE
NO. 26**

Courtroom: F-15th Floor
Magistrate Judge: Hon. Jacqueline Scott Corley
Trial: October 10, 2017

Filed/Lodged Concurrently with:
1. Declaration of Neel Chatterjee
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this administrative motion for an order to file under seal portions of Defendants’ Motion in Limine No. 26 (the “Administrative Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Defendants’ Motion in Limine No. 26	Highlighted Portions	Waymo LLC
Exhibit 1 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086885 – 00086892	Highlighted Portions	Waymo LLC
Exhibit 2 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00084492 – 00084505	Entire Document	Waymo LLC
Exhibit 3 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00084484 – 00084491	Highlighted Portions	Waymo LLC
Exhibit 4 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086932 – 00086939	Entire Document	Waymo LLC
Exhibit 5 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086907 – 00086917	Entire Document	Waymo LLC
Exhibit 6 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086800 – 00086808	Entire Document	Waymo LLC
Exhibit 7 to Vu Declaration – Excerpts of Deposition Transcript of Alexander (Sasha) Zbrozek dated September 6, 2017	Entire Document	Waymo LLC
Exhibit 8 to Vu Declaration – Excerpts of Deposition Transcript of Gary Brown dated August 8, 2017	Entire Document	Waymo LLC

Exhibit 9 to Vu Declaration – Excerpts of Deposition Transcript of Michael Murray Janosko dated August 25, 2017	Entire Document	Waymo LLC
Exhibit 10 to Vu Declaration – Email from Jeff Nardinelli dated July 18, 2017, 9:40 P.M.	Entire Document	Waymo LLC

The highlighted portions of Defendants’ Motion in Limine No. 26, the highlighted portions of Exhibits 1 and 3 to the Vu Declaration, and the entirety of Exhibits 2, 3, 4, 5, 6, 7, 8, 9, and 10 to the Vu Declaration contain information that Plaintiff Waymo LLC (“Waymo”) has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Administrative Motion and its supporting documents that merit provisional sealing.

Dated: September 13, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 13, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **September 13, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE